

# THE LAMBOS FIRM, LLP

C. PETER LAMBOS (1926-2003)  
WILLIAM M. SPELMAN  
NICHOLAS G. MAGLARAS (1951-2006)  
PETER C. LAMBOS (1954-1991)  
CAROL NOTIAS LAMBOS\* ^ + ■  
RICHARD J. CIAMPI, JR.\* ^ ■  
JAMES R. CAMPBELL\* ■■  
  
ANN MARIE FLYNN

ALSO ADMITTED IN: \*NJ ^ DC +FL ■ CT  
■ PA

ATTORNEYS AT LAW

303 SOUTH BROADWAY • SUITE 410  
TARRYTOWN, NY 10591

212.381.9700 • 212.943.2470  
FAX: 212.797.9213

NEW JERSEY  
707 BROADWAY  
BAYONNE, NJ 07002  
201.823.1000  
FAX: 201.437.4220

WWW.THELAMBOSFIRM.COM

January 8, 2024

**Via ECF**

Hon. Evelyn Padin  
United States District Judge  
United States Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

**Re:** *Int'l Longshoremen's Ass'n v. Hapag-Lloyd AG, et al.*  
**Civil Action No. 2:23-CV-04171 (EP)(JSA)**

Dear Judge Padin:

The undersigned firm is co-counsel to Respondent United States Maritime Alliance, Ltd. (USMX). On behalf of USMX, Respondents Hapag-Lloyd AG and Orient Overseas Container Line, Ltd., and Petitioner International Longshoremen's Association (ILA), we are writing to inform you that the parties have agreed to an extension of time until January 22, 2024, for Respondents to answer or otherwise move or respond to the ILA's Petition to Compel Arbitration. Respondents had previously obtained an extension of time through an application made pursuant to Local Civil Rule 6.1(b). The parties then filed a Stipulation for Extension of Time to Answer or Otherwise Respond to Petition, which extended Respondents time until January 8, 2024. This application is being made to allow the parties additional time to address issues raised in the Petition.

Respectfully submitted,

THE LAMBOS FIRM, LLP

COZEN O'CONNOR

By: s/ James R. Campbell

William M. Spelman\*  
James R. Campbell  
303 South Broadway, Suite 410  
Tarrytown, New York 10591  
Tel. (212) 381-9700  
wmspelman@lambosfirm.com  
jrcampbell@lambosfirm.com

By: s/ George A. Voegele, Jr.

Alfred D'Angelo\*  
George A. Voegele, Jr.  
One Liberty Place  
1650 Market Street, Suite 2800  
Philadelphia, PA 19103  
Tel. (215) 665-2000  
adangelo@cozen.com  
gvoegele@cozen.com

Hon. Evelyn Padin

Page 2

January 8, 2024

Jonathan C. Fritts\*  
MORGAN, LEWIS & BOCKIUS LLP  
1111 Pennsylvania Avenue, NW  
Washington, D.C. 20004  
Tel. (202) 739-5867  
jonathan.fritts@morganlewis.com

*Attorneys for Respondent  
United States Maritime Alliance, Ltd.*

BLANK ROME LLP

By: s/ Lauren B. Wilgus  
Lauren B. Wilgus  
1271 Avenue of the Americas  
New York, New York 10020  
Tel. (212) 885-5348  
lauren.wilgus@blankrome.com

Matthew J. Thomas\*  
BLANK ROME LLP  
1825 I Street NW  
Washington, D.C. 20006  
Tel. (202) 772-5971  
matthew.thomas@blankrome.com

*Attorneys for Respondent  
Orient Overseas Container Line, Ltd.*

Matthew Howell\*  
Wayne Rohde\*  
COZEN O'CONNOR  
1200 19th Street, NW, 3rd Floor  
Washington, D.C. 20036  
(202) 912-4800  
jlawrence@cozen.com  
mhowell@ cozen.com  
wrohde@cozen.com

*Attorneys for Respondent  
Hapag-Lloyd AG*

MAZZOLA MARDON, P.C.

By: s/ John P. Sheridan  
John P. Sheridan  
Brian A. Jasinski  
26 Broadway, 17<sup>th</sup> Floor  
New York, New York 10004  
Tel. (212) 425-3240  
jsheridan@mmpc.com  
bjasinski@mmpc.com

*Attorneys for Petitioner  
International Longshoremen's Association*

**So Ordered**

/s/Evelyn Padin, U.S.D.J.

**Hon. Evelyn Padin, U.S.D.J.**

1/8/24

\* Application for admission *pro hac vice* pending